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January 15, 2010

VIA CM/ECF ONLYHon. John J. Thomas
U.S. Bankruptcy Court for the
Middle District of Pennsylvania
U.S. Court House
197 S. Main St.
Wilkes-Barre, PA 18701Re: In re Mary Alice Hannon
5:06-bk-51870-JJT
Hannon v. Countrywide
Show Cause Order (Doc. 81)

Dear Judge Thomas

I write in response to the correspondence filed by Carlo Sabatini, Esq., filed yesterday as Document No. 86. As Mr. Sabatini correctly represents, I, along with my partner Dorothy Davis, Esq., of Eckert Seamans Cherin & Mellott, LLC, have entered our appearance in this case as counsel for Countrywide Home Loans, Inc., in substitution for Oren Klein, Esq. and Parker McCay, P.A. Additionally, Thomas A. Connop, Esq. and Bradley Knapp, Esq., of the Dallas, Texas office of Locke Lord Bissell & Liddell, LLP, have applied for *pro hac vice* admission in this proceeding to appear as co-counsel for Countrywide Home Loans, Inc.

We are investigating the issues the Court has directed Countrywide to address at the hearing presently scheduled for January 28, 2010. We will be filing a motion to continue the hearing for a period of approximately 45 days, to a date at the Court's convenience, to permit adequate preparation to comply with the Court's directive.

As to Mr. Sabatini's request for discovery, it is my understanding such discovery was abated by the Court pending resolution of issues relating to sanctions. While Mr. Sabatini expresses his belief the discovery he requests would be relevant to the issues to be addressed at the hearing, it is my understanding that the Order (Doc. # 81) is directed to the *Hannon* case alone. We appreciate Mr. Sabatini's determination not to pursue a motion to compel discovery at this time,


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and we will reserve comment on the specific contentions raised by Mr. Sabatini until such a motion may be filed, or as may be requested by the Court.

Thank you for your consideration.

Sincerely,


Dino A. Ross

DAR:dsc

cc: Carlo Sabatini, Esq. (CM/ECF only)